

National Aeronautics and Space Administration
Kennedy Space Center
Kennedy Space Center, FL 32899



November 9, 2010

Reply to Attn of: CC-A

TO: Distribution

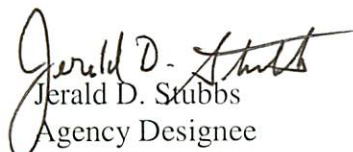
FROM: CC/Chief Counsel

SUBJECT: Determination Regarding Attendance at the Dedication of the New Efficiency Building for Propellants at KSC, December 1, 2010

On December 1, 2010, Sierra Lobo and URS Corporation will host a Ribbon Cutting Ceremony at the NASA Kennedy Space Center. Approximately 150 guests are expected to attend. These guests include corporate executives, representatives for the Federal Government, environmental leaders, academia, and NASA KSC senior staff. The estimated value of the refreshments is \$5 per person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend this event. NASA is helping the environment by building efficient buildings which will help reduce our reliance on fossil fuels and protecting the environment. Attendance will allow NASA attendees to discuss NASA and KSC's leadership role in supporting the important national goal to increase our energy independence while protecting the climate and environment. In addition, attendance will allow attendees to disseminate information on NASA's ongoing activities and to discuss matters of mutual interest with a diverse group.

Accordingly, NASA employees whose duties do not substantially affect the sponsor, including those employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge, may attend if they reimburse the sponsor for the refreshments. NASA employees whose duties may substantially affect any of the sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from the Chief Counsel's Office.


Gerald D. Stubbs
Agency Designee

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STD-L-A